

Williams, 467 U.S. 431, 444-445, n. 5 (inevitable discovery of evidence obtained by unlawful means); United States v. Matlock, 415 U.S. 164, 177-178, n. 14 (1974) (voluntariness of consent to search); Lego v. Twomey, 404 U.S. 477, 489 (1972) (voluntariness of confession). An arrest pursuant to warrant is, of course, presumptively lawful. Franks v. Delaware, 438 U.S. 154, 171 (1978). However, proof of the validity of the warrant is essential to assure appropriate constitutional protections and deter unlawful conduct. Because the best evidence of the validity of a warrant is the warrant itself, the State should be required to introduce the warrant into evidence where it seeks to prove the lawfulness of an arrest.

CONCLUSION

The petitioner respectfully requests that this Court issue a writ of certiorari to the Court of Special Appeals of Maryland, and reverse the decision of that court.

Respectfully submitted,

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